

**Subject:** Re: CPRA  
**From:** Ellen Riotto <ellen@southpark.la>  
**Date:** 2/10/17, 5:06 PM  
**To:** Katie Kiefer <katie@southpark.la>, Carol Humiston <chumiston@bglawyers.com>

Thanks for all the insight, Carol. Yes, still on for Monday's call. Have a great weekend and talk to you then!

Ellen Riotto  
Interim Executive Director  
id:image

South Park Business Improvement District  
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24/7 DISPATCH: 866-560-9346

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**From:** Katie Kiefer <katie@southpark.la>  
**Date:** Friday, February 10, 2017 at 5:04 PM  
**To:** Carol Humiston <chumiston@bglawyers.com>  
**Cc:** Ellen Riotto <ellen@southpark.la>  
**Subject:** Re: CPRA

Noted on paying for flash drives. Forgot about those suckers.

Looping Ellen back onto the chain and yes, still on for Monday's call.

Have a great weekend, Carol.

Katie Kiefer  
South Park BID  
1100 S. Flower St., Suite #3400, Los Angeles, CA 90015  
o. 213 663 1120  
  
24/7: 866 560 9346

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**From:** Carol Humiston <chumiston@bglawyers.com>  
**Date:** Friday, February 10, 2017 at 4:42 PM  
**To:** Katie Kiefer <katie@southpark.la>  
**Subject:** RE: CPRA

I would not. I would put it on a zip drive EVERY TIME and make him pay. Buy them with very little storage capacity, so you need to use more than one and charge him for more than one. He is collecting a lot of stuff

Re: CPRA

he does not want. We need to make him pay. If he pushes back about paying to put on a zip drive, let me know. I would love to fight that battle.

And we are still meeting on Monday?

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**From:** Katie Kiefer [mailto:[katie@southpark.la](mailto:katie@southpark.la)]  
**Sent:** Friday, February 10, 2017 4:40 PM  
**To:** Carol Humiston  
**Cc:** Ellen Riotto  
**Subject:** Re: CPRA

Very helpful, thank you.

With regards to native format, can the "public benefit doesn't outweigh the private benefit" reasoning if we want to continue giving him printed PDFs?

Katie Kiefer  
South Park BID  
1100 S. Flower St., Suite #3400, Los Angeles, CA 90015  
o. 213 663 1120

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**From:** Carol Humiston <[chumiston@bglawyers.com](mailto:chumiston@bglawyers.com)>  
**Date:** Thursday, February 9, 2017 at 7:13 PM  
**To:** Katie Kiefer <[katie@southpark.la](mailto:katie@southpark.la)>, "Katie Kiefer ([katie.e.kief@gmail.com](mailto:katie.e.kief@gmail.com))" <[katie.e.kief@gmail.com](mailto:katie.e.kief@gmail.com)>  
**Cc:** Ellen Riotto <[ellen@southpark.la](mailto:ellen@southpark.la)>  
**Subject:** CPRA

Katie,

I hope I am covering everything you asked about. I set this up in a particular way for a reason so if you want to talk tomorrow, I am in most of the day. I would suggest you do not make this part of a running email. Have them stand alone.

You have requested thousands of pages of records previously provided to you, specifically \_\_\_\_\_, be reprovided to you in their "native format." The voluminous scope of that request, as well as a significant number of additional CPRA requests you made in 2016, necessitated that the BID hire a paralegal to search the BIDs computers for the records you sought and redact exempt materials, a practice that the BID will not be repeating in 2017. The CPRA is to be interpreted as a balance between the right of public access and the need for efficient and effective BID management. In this case, I have concluded that the public benefit in searching the BIDs computers a second time and redacting exempt material a second time in order to provide you those records in their native format does not outweigh the public burden in doing so. In the future, you will be requested to provide a more specific and focused request, which I will be happy to assist you in doing.

Your requests for "all emails from 2016 between anyone at the SPBID, staff or board, and anyone at StreetPlus," seeks a voluminous class of documents which will need to be significantly focused before any attempt to comply can be commenced. Moreover aside from the sheer volume of documents, I have determined that the nature of the records requested would include records that would fall under a number of exemptions under the CPRA, including personnel information, the deliberative process privilege, proprietary information, identity of informants, records relating to arrests, personal contact information, and records to which the public benefit of disclosure does not outweigh the public benefit in non-disclosure. Further, the burden of redaction would be too great because exempt matter cannot be reasonably segregated and is inextricably intertwined in the records you have requested. Likewise, your request for "all emails between anyone on the SPBID staff, present or former, or Board and anyone at lacity.org or any of its subdomains for 2016 as well as anybody at the domain devine-strategies.com from 1969 through whenever you comply with this request" seeks a voluminous class of documents which will need to be significantly focused before any attempt to comply can be commenced. Again, aside from the sheer volume of documents, I have determined that the nature of the records requested would include records that would fall under a number of exemptions under the CPRA, including the deliberative process privilege, proprietary information, personal contact information, and records to which the public benefit of disclosure does not outweigh the public benefit in non-disclosure. In addition, I have no idea what all of the "lacity.org domain names" are. Further, the burden of redaction would be too great because exempt matter cannot be reasonably segregated and is inextricably intertwined in the records you have requested. You will need to provide a specific and more focused request. If you would like to inform me what you are interested in attempting to locate, I will be happy to assist you in limiting your request to obtain the necessary records outside the exemptions.

In response to your email of February 9, 2017, the BID does not have a mailing list that will be used to print out petitions for the BID adoption/renewal process. However, if it did have it, I have determined that such a list would contain personal contact information, would invade the right to privacy of the individuals whose personal contact information was contained thereon, the public benefit in disclosure would not outweigh the public benefit in non-disclosure, and as such, would be exempt from disclosure.

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—Attachments:

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